

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION**

**NORTH DAKOTA HUMAN RIGHTS
COALITION, IMMIGRANT
DEVELOPMENT CENTER, and
PLAINTIFF DOE,**

Plaintiffs,

v.

**PATRIOT FRONT, THOMAS
ROUSSEAU, TREVOR VALESCU, and
JOHN DOES 1-10,**

Defendants.

Case No.: Case 3:23-cv-00160-ARS

**DECLARATION OF CHRISTINA E. DIEROLF IN SUPPORT OF PLAINTIFFS'
MOTION FOR LEAVE TO EXECUTE SERVICE OF PROCESS BY PUBLICATION
PURSUANT TO FED. R. CIV. P. 4(h) AND 4(e)(1)**

I, Christina E. Dierolf, declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief and that I could competently testify, if called, to the following:

1. I am an associate with the law firm Morrison & Foerster LLP, co-counsel of record for Plaintiffs in the above-entitled action. I am over the age of 18 years and am not a party to this action. I submit this declaration in support of Plaintiffs' Motion for Leave to Execute Service of Process by Publication Pursuant to Fed. R. Civ. P. 4(h) and 4(e)(1).

2. The Complaint is based on Defendants' tortious conduct, which caused injury to Plaintiffs in Fargo, North Dakota.

3. Plaintiffs have been unable to locate any physical address associated with Defendant Patriot Front.

4. Plaintiffs have been unable to locate any physical address viable for personal service on Defendant Thomas Rousseau.

5. Plaintiffs have engaged a private investigator to assist with locating and serving Defendant Rousseau.

6. Plaintiffs have made multiple attempts to serve Defendant Trevor Valescu at his last address known to them. These attempts have been unsuccessful.

7. An in-house investigator employed by Plaintiffs' counsel at Robins Kaplan LLP first made several attempts to serve Defendant Valescu at 1218 Amber Lane, Faribault, Minnesota, on September 14, 2023, between 12:00 p.m. and 2:30 p.m. The home was dark and there was a dog present. The investigator noticed surveillance cameras mounted on the exterior of the home. The investigator was not able to make contact with anyone at the home.

8. The investigator returned to 1218 Amber Lane on September 15, 2023 between 6:50 p.m. and 7:45 p.m. The investigator observed the same conditions: the home was dark, there was a dog present, and there were cameras on the home. Again, the investigator was not able to make contact with anyone at the home.

9. Plaintiffs have engaged a private investigator to assist with locating and serving Defendant Valescu.

10. To the best of my knowledge, information, and belief, after diligent inquiry, personal service of the summonses issued in this action cannot be served on Defendants Patriot Front, Thomas Rousseau, or Trevor Valescu.

11. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' Proposed Notice of Publication of Summons.

I declare and can competently testify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on November 30, 2023, in San Francisco, CA.


Christina E. Dierolf